

# Memorandum

**U.S. Department** of Transportation

**National Highway Traffic Safety Administration** 

04TSA-03-14631-2

Subject:

Petition 535 for Import Eligibility

MAR - 5 2003 Date:

Decision on 1986 Chevrolet Blazer

Multipurpose, Passenger Vehicles

From:

ol Mh Coleman Sachs

Reply to Attn. of:

Office of Vehicle Safety Compliance

To:

Docket Management

Please place the attached petition for a decision that nonconforming 1986 Chevrolet Blazer multipurpose passenger vehicles are eligible for importation in Docket No. NHTSA-2003-14631.

Attachment







January 29, 2003

# Petition for Import Eligibility Determination

Administrator National Highway Traffic Safety Administration Room 6115 400 7th Street SW., Washington, DC 20590

**ATTN: NEF-32 Import Eligibility** 

Petitioner: Wallace Environmental Testing Laboratories, Inc.

2140 Wirtcrest

Houston, Texas 77055-1348

Registered Importer Number R-90-005

Wallace Environmental Testing Laboratories, Inc. (WETL) would like to submit this petition under the provisions set forth in 49 CFR Part 593.

The basis for this petition is a comparison to a substantially similar vehicle which was originally manufactured in the United States for sale in the United States. The comparison vehicle, which was manufactured in the United States for exportation into the European market, can be readily modified to conform to all applicable Federal motor vehicle safety standards (FMVSS). Therefore, WETL submits this petition based on the guidelines set forth in 49 CFR 593.6(a).

The vehicle for which this determination is sought was originally manufactured by Chevrolet for the European and other foreign markets. The vehicle inspected was a 1986 model year with a vehicle identification number (VIN) of **1G8ED18J1GF169796** The model is the Chevrolet Blazer manufactured by Chevrolet for the 1986 model year. Hereafter this vehicle will be referred to as the EUBlazer.

The vehicle which is substantially similar was also manufactured by Chevrolet for the United States. The model designation for the US production vehicle is also the Chevrolet Blazer and was produced for the 1986 model year. Hereafter this vehicle will be referred to as the USBlazer.

The USBlazer was certified by Chevrolet pursuant to 49 CFR 567. The vehicle was produced in the US by Chevrolet. Chevrolet sold this vehicle as a 1986 model year and affixed a label to it certifying that it complied with all applicable FMVSS.

It is common practice for vehicle manufacturers to produce substantially similar vehicles for different markets throughout the world. While the vehicles are essentially the same, the differences are related to the marketability and or legislation of the different countries. It is important to note that



the EUBlazer complies with many FMVSS without any modification. WETL performed a careful evaluation of the EUBlazer and determined the vehicle to be substantially similar to the USBlazer.

In accordance with the requirements of 49 CFR 593.6(a)(5), the remainder of this petition will give data, views, and arguments with respect to each FMVSS which applied to the USBlazer and demonstrate that the EUBlazer was either originally manufactured to conform to such standard, or is capable of being readily modified to conform to such standard. All statements that the EUBlazer complies with the requirements of the standard and is identical to the USBlazer with respect to the standard are based on information obtained during a detailed inspection of the EUBlazer for which this determination is sought. In addition, WETL reviewed all available parts, service, and sales literature in order to thoroughly compare the vehicles.

# **FMVSS 101**

The EUBlazer complies with the requirements of this standard and is identical to the USBlazer with respect to this standard.

# **FMVSS 102**

The EUBlazer complies with the requirements of this standard and is identical to the USBlazer with respect to this standard.

# **FMVSS 103**

The EUBlazer complies with the requirements of this standard and is identical to the USBlazer with respect to this standard.

# **FMVSS 104**

The EUBlazer complies with the requirements of this standard and is identical to the USBlazer with respect to this standard.

# **FMVSS 105**

#### NOT APPLICABLE.

#### **FMVSS 106**

The EUBlazer complies with the requirements of this standard and is identical to the USBlazer with respect to this standard.



## **FMVSS 108**

The EUBlazer complies with the requirements of this standard and is identical to the USBlazer with respect to this standard.

## **FMVSS 111**

The EUBlazer complies with the requirements of this standard and is identical to the USBlazer with respect to this standard except as noted below.

The passenger side rearview mirror is of a flat, 1:1 magnification.

# **FMVSS 113**

The EUBlazer complies with the requirements of this standard and is identical to the USBlazer with respect to this standard.

# **FMVSS 114**

The EUBlazer complies with the requirements of this standard and is identical to the USBlazer with respect to this standard except as noted below.

The EUBlazer will require the addition of a gong module (part number 14101255) in order to comply with standard.

## **FMVSS 116**

The EUBlazer complies with the requirements of this standard and is identical to the USBlazer with respect to this standard.

# **FMVSS 118**

## **NOT APPLICABLE**

# **FMVSS 119**

The EUBlazer complies with the requirements of this standard and is identical to the USBlazer with respect to this standard.

## **FMVSS 120**

The EUBlazer requires the addition of a tire information placard to be in compliance with this standard.



# **FMVSS 124**

The EUBlazer complies with the requirements of this standard and is identical to the USBlazer with respect to this standard.

# **FMVSS 201**

#### **NOT APPLICABLE**

# **FMVSS 202**

The EUBlazer complies with the requirements of this standard and is identical to the USBlazer with respect to this standard.

# **FMVSS 203**

#### **NOT APPLICABLE**

# **FMVSS 204**

The EUBlazer complies with the requirements of this standard and is identical to the USBlazer with respect to this standard.

# **FMVSS 205**

The EUBlazer complies with the requirements of this standard and is identical to the USBlazer with respect to this standard.

#### **FMVSS 206**

The EUBlazer complies with the requirements of this standard and is identical to the USBlazer with respect to this standard.

# **FMVSS 207**

The EUBlazer complies with the requirements of this standard and is identical to the USBlazer with respect to this standard.

# **FMVSS 208**



The EUBlazer complies with the requirements of this standard and is identical to the USBlazer with respect to this standard except as noted below.

The EUBlazer is not equipped with a safety belt warning system for the driver. The safety belt warning system will have to be modified to include an audible gong The Chevrolet gong module that will be added bears a part number of 14101255. This module will enable the safety belt warning system to function properly.

It is important to note that the EUBlazer is identical to the USBlazer in all areas related to the passive restraint system except as specifically noted in this section.

Both front outboard designated seating positions are factory equipped with Type II seat belts. Left, right, and center rear designated seating positions are factory equipped with Type I seat belts. The driver's and passengers' seating positions comply as equipped from the factory.

Driver and passenger front outboard seating positions are not required to have air bags.

# **FMVSS 209**

The EUBlazer complies with the requirements of this standard and is identical to the USBlazer with respect to this standard.

#### **FMVSS 210**

The EUBlazer complies with the requirements of this standard and is identical to the USBlazer with respect to this standard.

## **FMVSS 212**

The EUBlazer complies with the requirements of this standard and is identical to the USBlazer with respect to this standard.

# **FMVSS 214**

The EUBlazer complies with the requirements of this standard and is identical to the USBlazer with respect to this standard.

## **FMVSS 216**

NOT APPLICABLE

### **FMVSS 219**



The EUBlazer complies with the requirements of this standard and is identical to the USBlazer with respect to this standard.

# **FMVSS 301**

The EUBlazer complies with the requirements of this standard and is identical to the USBlazer with respect to this standard.

# **FMVSS 302**

The EUBlazer complies with the requirements of this standard and is identical to the USBlazer with respect to this standard.

# 49 CFR Part 541

## **NOT APPLICABLE**

# 49 CFR Part 565

The EUBlazer complies with the requirements of this standard and is identical to the USBlazer with respect to this standard.

# 49 CFR Part 567

The EUBlazer will require the addition of a certification label in the driver's door jamb to conform to the requirements of this standard.

# 49 CFR Part 581

## **NOT APPLICABLE**

I would like to thank you in advance for your consideration in this matter and invite you to contact myself or a member of my staff if you have any questions or comments.

Sincerely,

Les Weaver
Vice President

Wallace Environmental Testing Laboratories, Inc.